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Attorneys for Plaintiff
 WILLIAM HOWARD

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

WILLIAM HOWARD,
 Plaintiff,

vs.

CONTRA COSTA COUNTY; DAVID
 LIVINGSTON; SEAN FAWELL; TOWN OF
 DANVILLE and DOES 1 through 50, inclusive,
 Defendants.

Case No. 3:13-CV-03626-NC

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO RESET THE TRIAL DATE AND TO
 EXTEND DEADLINES TO COMPLETE
 DISCOVERY AND TO FILE DISPOSITIVE
 MOTIONS AS MODIFIED**

Plaintiff William Howard and Defendants Contra Costa County, David Livingston and Sean Fawell, by and through their attorneys of record, respectfully request that the Court give effect to this stipulation related to the trial date and extending the time for the parties to complete discovery and file dispositive motions. The parties, through counsel, hereby stipulate as follows:

1. On January 7, 2015, the parties attended a case management conference before the Honorable Nathanael Cousins. The parties were advised that the Honorable Nathanael Cousins could not try the above-captioned case on June 1, 2015 at the San Francisco Division due to reassignment to the San Jose Division. The Honorable Nathanael Cousins offered a trial date of July 20,

2015 at the San Francisco Division. Having met and conferred, the parties and counsel are available for trial on July 20, 2015 and by this stipulation request that the trial be reset to July 20, 2015 in the San Francisco Division.

2. The current discovery deadlines are as follows:

- February 9, 2015 – last day to complete non-expert discovery
- February 17, 2015 – last day to designate experts
- March 2, 2015 – last day to disclose rebuttal experts
- March 16, 2015 – last day to complete expert discovery
- March 20, 2015 – last day to file dispositive motions

3. Plaintiff and Defendants have met and conferred regarding the deadlines to complete discovery and file dispositive motions based on the new trial date of July 20, 2015. The parties agree and stipulate that good cause exists to extend the deadlines to complete discovery and file dispositive as follows:

- March 30, 2015 – last day to complete non-expert discovery
- April 7, 2015 – last day to designate experts
- April 20, 2015 – last day to disclose rebuttal experts
- May 4, 2015 – last day to complete expert discovery
- May 8, 2015 – last day to file dispositive motions

Dated: January 22, 2015

THE CARDOZA LAW OFFICES, INC.

By: /s/
Jacqueline C. Fagerlin, Esq.
Attorney for Plaintiff
Email: jfagerlin@cardolaw.com

Dated: January 22, 2015

TODD BOLEY, ESQ.

By: /s/
 Todd Boley, Esq.
 Attorney for Defendants
 Email: boleym@boyleylaw.com

MODIFIED
~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWING, IT IS SO ORDERED that the trial of the above-referenced matter be reset from June 1, 2015 to July 20, 15 at 9:00 a.m., Courtroom A, 15th Floor, San Francisco Division.

IT IS FURTHER ORDERED that the time for the parties to complete discovery and file dispositive motions be extended to:

- March 30, 2015 – last day to complete non-expert discovery
- April 7, 2015 – last day to designate experts
- April 20, 2015 – last day to disclose rebuttal experts
April 27, 2015
- ~~May 4, 2015~~ – last day to complete expert discovery
May 1, 2015
- ~~May 8, 2015~~ – last day to file dispositive motions
- * July 1, 2015 - Pretrial Conference set for 2:00 p.m. in Courtroom A, 15th Floor, San Francisco.

Dated: January 26 2015

By: _____
Hon. Nathanael Cousins
U.S. District Court
Northern District of California

